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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

360 DEGREE EDUCATION, LLC *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, *et al.*,

Defendants.

No. 4:24-cv-00508-P

SECOND DECLARATION OF SHARI MECCA

I, Shari Mecca, do declare under penalty of perjury, and pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my information and belief:

1. I am employed by the United States Department of Education (Department) as one of the case managers for Federal Student Aid's (FSA) Multi-Regional and Foreign Schools Participation Division. As a case manager, I am responsible for the general oversight of 10 large school groups that participate in the Title IV programs and are located in multiple states across the country. I have been employed by the Department since April 2010. I make the statements below based on my personal knowledge and information I have obtained in my official capacity.

2. As a FSA case manager, I communicate regularly with school representatives, state licensing boards, and accreditors. In order to carry out my duties as case manager, I regularly request and receive information regarding schools' and programs' compliance with licensing and accreditation requirements, and regarding state licensing agencies' approvals of particular programs offered by a school. Based on my experience, I understand that state

licensing agencies and accreditors regularly keep files regarding each school for which they provide licenses or program approvals and are able to locate information about a school or program in their files. State licensing agencies and accreditors regularly provide information in response to FSA inquiries. Among other things, FSA and other Department components rely on the information that state licensing agencies and accreditors provide to FSA staff for general monitoring purposes, to verify information provided by a school, and to address any questions that might arise regarding whether a program offered at an institution is in compliance with Title IV requirements. FSA maintains email correspondence with state licensing agencies and accreditors, as well as any documents received from state licensing agencies and accreditors, in its files as part of its regular oversight activities.

2. One of the large school groups I oversee is Ryan Ross, LLC. According to information in FSA files, Ryan Ross is owned 100% by Neal Heller. Ryan Ross owns seven corporations that operate postsecondary institutions participating in the Title IV programs. Those corporations are Outside the Box Education LLC, Education to Vocation LLC, 360 Degree Education LLC, Full Circle Education LLC, Innovation Education LLC, Way Beyond Education LLC and Beauty Careers Institute, Inc. These corporations are all incorporated in the state of Florida and have their corporate offices in that state. The seven corporations operate 11 postsecondary institutions under the brands Cortiva Institute, Hollywood Institute, and Hollywood Institute of Beauty Careers. The Cortiva Institute brand was purchased from Steiner Education Group, Inc. in 2019. The 11 institutions are located in Florida, Texas, Pennsylvania, Maryland and Connecticut. According to the Department's College Navigator website, as of June 2024, the enrollment for the 11 schools was approximately 2400, with about 65% of that student population attending locations in Florida.

3. Cortiva Institute's location in Arlington, Texas (Cortiva) participates in the Title IV programs under a Program Participation Agreement with the Department identifier OPE ID 02279600. The same Program Participation Agreement also covers 360 Degree's other Cortiva Institute located in St. Petersburg, Florida. The Program Participation Agreement designates the St. Petersburg location as the main location and the Arlington, Texas location as an additional location. As of June 2024, the Arlington, Texas location had approximately 108 students.

4. To participate in the Title IV programs, institutions must be licensed by the state in which they operate and must be approved by an accreditor recognized by the Department. *See* 34 C.F.R. §§ 600.4(a)(3), (5); 600.5(a)(4), (6); 600.6(a)(3), (5); 600.9. The Florida location of Cortiva is licensed by the Florida Department of Education/Commission for Independent Education, and the Texas location is licensed by the Texas Department of Licensing and Regulation (TDLR). Both schools are accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).

5. Each program that a participating postsecondary institution provides must also be legally authorized by the state and approved by the institution's accreditor to be Title IV eligible. *See* 34 C.F.R. §§ 600.2 (definition of educational program), 668.8(a). Where states approve programs of a specific number of clock or credit hours, the Department considers the state's authorization to cover only programs of that length.

6. When Cortiva changed ownership in 2019, it applied to the Department to remain eligible for Title IV under 34 C.F.R. §§ 600.20, 600.31. However, during this process, Cortiva submitted, and FSA staff reviewed, only TDLR's general licensing documents for the Cortiva institution in Arlington, Texas. FSA staff did not review TDLR's approval for Cortiva's Professional Massage Therapy (Massage) Program. At that time, the program length listed in the

Department records for Cortiva's Massage Program in Arlington, Texas was 600 clock hours. This matched the accreditor approval documents.

7. I am aware of and have reviewed the statements made in the Declaration of Nicole Vitez submitted in this case, dated June 13, 2024. Ms. Vitez's declaration identifies one communication between herself, on behalf of Cortiva, and the Department. That communication occurred in April 2023 through email between Ms. Vitez and myself. In her initial April 6, 2023 email, Ms. Vitez informed me of a non-substantive program modification that applied generally to Cortiva Massage programs at various locations. *See* Exhibit A at 1.¹ The documents attached to her April 6, 2023 email primarily included approvals issued by Florida's Commission for Independent Education and ACCSC, relating to Cortiva locations in St. Petersburg, Florida, Maitland, Florida, and Pompano Beach, Florida. *See id.* at 2, 7-17. The only materials relating to Cortiva's Massage Program in Arlington, Texas were an email from TDLR stating that "there will not be any additional requirements with TDLR," *id.* at 3, and an ACCSC approval, *id.* at 4-6. Ms. Vitez did not provide any approval document from TDLR reflecting the hours that TDLR had approved for Cortiva's Massage Program in Arlington, Texas.

8. On June 6, 2024, after the filing of the Complaint in this case, I contacted TDLR to see if Cortiva had submitted an application to reduce the number of hours in its Massage Program from 600 to 500, the minimum required for licensure, based on the Department's revised program length provision, 34 C.F.R. § 668.448(b)(26)(ii)(A), that was set to go into effect on July 1, 2024. TDLR's Education and School Services Manager Lorraine Sroufe responded to my question, notifying me that Cortiva and other massage therapy schools "are

¹ Exhibit A is a true and accurate copy of an April 6, 2023 email from Ms. Vitez to myself, together with the attachments to that email. The email and attached documents are kept in FSA record systems in the ordinary course of business.

only approved to offer the 500-hour massage therapy course,” and that Cortiva “is not approved to offer under or over the required 500-hour course.” Exhibit B at 3.² Ms. Sroufe also provided me the relevant TDLR Massage Therapy Course Certificate of Approval, dated 9/1/2020, which states that Cortiva “is authorized to offer the course noted below in accordance with the Massage Therapy Law §455.156 for License Requirements for Massage Therapist,” and identifies the approved course as a “Massage Therapy 500 Hour Course.” *See id.* at 4.³ Ms. Sroufe further informed me that Texas state law does not allow massage programs in Texas to be approved for hours in excess of 500 hours. *See id.* at 2.

9. I have reviewed Ms. Vitez’s claim in her declaration that “[s]ince at least 2019, . . . Cortiva has been approved by the TDLR to offer a massage therapy program in excess of 500 hours.” Declaration of Nicole Vitez ¶ 7. That statement contradicts the information I received directly from TDLR as described above. I have also reviewed the documents that Ms. Vitez attached to her declaration and have concluded that none of those documents shows that TDLR has approved a 600 hour massage therapy course. For example, Ms. Vitez attached a form that she claims was submitted to TDLR in 2019, entitled “Request to Offer Basic Massage Therapy Educational Program in Excess of 500 Hours.” *See Vitez Decl.* ¶ 9 & ex.A, at 8. However, Ms. Vitez did not attach any decision by TDLR in response to that request. Moreover, the Certificate of Approval that TDLR provided in response to my inquiry is dated 9/1/2020, after Ms. Vitez

² Pages 1-3 of Exhibit B are a true and accurate copy of email communications between myself and Ms. Sroufe at TDLR between June 6, 2024 and June 11, 2024. These email communications are kept in FSA record systems in the ordinary course of business.

³ Page 4 of Exhibit B is a true and accurate copy of the Certificate of Approval for Cortiva’s Massage Program, which was attached to Ms. Sroufe’s first email to me on June 6, 2024, *see* Exhibit B at 2-3. The email and attached documents are kept in FSA record systems in the ordinary course of business.

submitted her 2019 request, and identifies the approved course as a “500 Hour Course.” *See* Exhibit B at 4.

10. I have also reviewed the email exchange dated June 14, 2024 between Farnaz Farkish Thompson and Doug Jennings, TDLR General Counsel, in which Mr. Jennings states that “TDLR does not prohibit a massage school from providing a program in excess of 500 hours” and that “a school offering such a program must obtain a signed ‘massage student acknowledgement’ (TDLR form # MAS123N) from the students.” Declaration of Farnaz F. Thompson ex. B, at 1. The information provided by Mr. Jennings does not contradict the information I obtained from Ms. Sroufe. Mr. Jennings did not indicate that TDLR provides official approval to massage therapy programs of more than 500 hours. Mr. Jennings also did not indicate that Cortiva’s 600-hour massage therapy program has been approved by TDLR. I have also reviewed TDLR Form MAS123N rev Aug 2021, which is attached to Ms. Vitez’s declaration at the third page of Exhibit G and is entitled “Massage Student Acknowledgement.” Nothing in the contents of that form states that TDLR has approved Cortiva’s 600-hour Massage Program. The only reference in the form to course hours is the statement, “I understand that the State of Texas requires only the minimum 500-hour course of instruction for licensure as a massage therapist, and anything beyond that is strictly voluntary.” *Id.*

11. On June 24, 2024, after Mr. Jennings’ communication with Ms. Thompson, Ms. Sroufe at TDLR emailed me to ask about the new program length regulation and again confirmed that “TDLR will not and cannot approve any massage, barber, or cosmetology course

for more than the required hours of education for licensure,” which in Texas is 500 hours. *See* Exhibit C at 2.⁴

12. Based on the information provided by TDLR, Cortiva’s 600-hour Massage Program in Arlington, Texas is not Title IV eligible because it exceeds the hours approved by the state. FSA staff has further determined that TDLR’s 500-hour limit on approvals for massage therapy programs similarly means that other massage therapy programs in Texas that exceed 500 hours are also not Title IV eligible. On July 19, 2024, Martina Fernandez-Rosario, Director of FSA’s School Eligibility and Oversight Service Group, sent an email to Ms. Sroufe at TDLR, notifying her that the Department “will be reviewing the Title IV eligibility of all massage programs provided at institutions in Texas participating in the Title IV programs to determine if the institutions have been improperly disbursing Title IV funds to students in massage programs with hours in excess of the 500 clock hours approved by TDLR.” *See* Exhibit D.⁵ Consistent with that email, the Department will soon notify Cortiva, and similarly situated institutions in Texas, that massage programs in excess of 500 hours are not eligible for Title IV funding because the state only approves 500-hour massage programs, and such institutions should not continue disbursing Title IV funds to students enrolled in massage programs that exceed the length approved by the state. The institutions will also be notified that, if they wish to seek a new Title IV eligibility determination from the Department to offer a program that is consistent

⁴ Exhibit C is a true and accurate copy of email communications between myself and Ms. Sroufe at TDLR between June 10, 2024 and July 11, 2024. These email communications are kept in FSA record systems in the ordinary course of business.

⁵ Exhibit D is a true and accurate copy of the email sent by Martina Fernandez-Rosario, Director, School Eligibility and Oversight Group, FSA, to Ms. Sroufe at TDLR, dated July 19, 2024. This email communication is kept in FSA record systems in the ordinary course of business.

with the hours approved by TDLR, they may do so provided they have also obtained accreditor approval for the same program.

13 In my earlier declaration, I also addressed the plaintiffs' allegations in this case that Cortiva's Texas location had lost Veterans Affairs (VA) benefits as a result of the Department's revised program length regulation. I explained that information I obtained from the Texas Veterans Commission State Approving Agency (SAA) contradicted the plaintiffs' claim and instead confirmed that the Department's revised program length regulation played no role in the SAA's denial of Cortiva's request to approve a 600-hour massage program. Rather, the SAA denied Cortiva's request because TDLR had only approved a 500-hour massage therapy program, as described above. Based on my review of material provided by the plaintiffs in this case with their June 14, 2024 reply brief, the plaintiffs provided nothing that contradicts the information I obtained directly from the SAA.

Executed on this 26 day of July 2024.

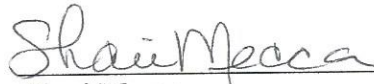

Shari Mecca

EXHIBIT A

Mecca, Shari

From: Nicole Vitez <NVitez@hi.edu>
Sent: Thursday, April 6, 2023 11:20 AM
To: Mecca, Shari; Dossa, Shein
Cc: Neal R. Heller
Subject: ECAR update- Non-Substantive Program Modification OPEIDs #030086 & 022796
Attachments: 022796 Credit Hour Non-Sub Modifcation.pdf; 030086 Credit Hour Non-Sub Modifcation.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning Ms. Mecca and Ms. Dossa:

Please see attached state and accreditor approvals for a non-substantive program modification to the Professional Massage Therapy Program in our campuses approved under the following OPEIDs #030086 & 022796.
 We will make the adjustments to the EAPP shortly, updating the program information to reflect 20 FA credit units and 600 instructional hours/25 weeks.

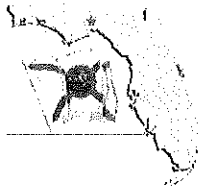
PROGRAM BREAKDOWN BY COURSE					
Course Number	Title: Professional Massage Therapy Program	Theory (Didactic) Hours	Lab Hours	Outside Hours	Semester Academic Credits
	ACADEMIC INSTRUCTION				
MA-101	Therapeutic Massage & Bodywork	70	50	15	4.5
MA-102	Anatomy & Physiology	70	20	22.5	4
MA-103	Kinesiology & Pathologies	60	30	22.5	3.5
MA-104	Professional Ethics & Business	60	30	22.5	3.5
MA-105	Clinical Assessment & Therapies	70	50	15	4.5
MA-106	Allied Modalities	70	20	22.5	4
Subtotal:		400	200	120	24

Please let us know if any additional information is needed and Thank you for your assistance in this matter.

Best Regards,

Nicole Vitez
 Director of Compliance
Hollywood Institute of Beauty Careers
Cortiva Institute/Hollywood Institute
 Office # (954) 962-2624
NVitez@hi.edu

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Commission for Independent Education

Approved Data

Cortiva Institute - Florida (ID# 585)

Corporation Data

Name: 360 Degree Education, LLC

Foreign or Domestic: Domestic

Profit or Non Profit: Profit

Address Data

2370 34th Street North

St. Petersburg, FL 33713

Pinellas County

Contact Data

Contact: Ms. Nicole Vitez

Phone: (727) 865-4940 **Phone Ext:** 4947

Fax: (727) 545-0053

E-Mail: nvitez@cortiva.edu

Web Site: www.cortiva.com

License Data

Lic #: 585 **Campus Type:** Main

Lic Status: License By Means of Accreditation

Program Specialist: Ashley Schenck

Annual Review Date: 1/31/2024

Accredited by:	Level of Accreditation:	Last Granted:	Renewal Date:	Next visit Scheduled:
ACCSC	Institutional	02/01/2020	02/01/2025	02/28/2010

Program Title as Licensed:	Hours:		Degree Type:	Credential:
	Clock	Credit		
Makeup Artistry and Skin Care	600	29.5		Diploma
Paramedical Skin Care	600	29.5		Diploma
Professional Massage Therapy	600	24		Diploma
Skin Care	300	11		Diploma

Ashley Schenck
Program Specialist
Commission for Independent Education

Page 1 of 1
3/23/2023 3:20:10 PM

Nicole Vitez

From: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Sent: Wednesday, April 5, 2023 9:10 AM
To: Nicole Vitez
Subject: RE: [External Email] [WARNING : MESSAGE ENCRYPTED]MS1072

CAUTION: This email originated outside of HI.EDU or Cortiva.EDU, DO NOT click on any links or attachments unless you recognize the sender and know the content is safe. When in doubt, contact your supervisor or Morsecom Technology Division.

Good morning Nicole,

No, there will not be any additional requirements with TDLR based on the modifications with ACCSC.

Thank you,

*Lorraine Sroufe
Occupational & Technical Services Team Lead
Education & Examination Division*



TEXAS DEPARTMENT OF
LICENSING & REGULATION Texas Department of Licensing and Regulation - Forms - TDLR – Education Form
"It's never too late to be what you might have been." George Eliot

From: Nicole Vitez <NVitez@hi.edu>
Sent: Tuesday, April 4, 2023 8:49 AM
To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Subject: [External Email] [WARNING : MESSAGE ENCRYPTED]MS1072

CAUTION: This email originated from outside of the organization! Do not click links, open attachments or reply, unless you recognize the sender's email address and know the content is safe!

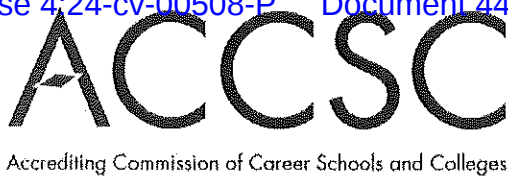
Good Morning Lorraine,

We completed a non-substantive credit hour modification with our accreditor, but the clock hours approved remain unchanged as our current approval with TDLR, would this change need to go through any approval prior to implementation?

Thank you!

Best Regards,

Nicole Vitez
Director of Compliance
Hollywood Institute of Beauty Careers
Cortiva Institute/Hollywood Institute
Direct # (561) 319-2423



2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

December 1, 2022

ELECTRONIC DELIVERY

nicole.green@cortiva.edu

Nicole Green
Campus Director
Cortiva Institute
808 W. I-20, Suite 100
Arlington, Texas 76017

School #B072471

Dear Ms. Green:

The Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") received the Program Modification Report – Non-substantive Modifications submitted by Cortiva Institute located in Arlington, Texas. Upon reviewing the information provided, the following modifications to the school's programs have been approved.

Program	Instructional Clock Hours	Semester Academic Credit Hours	Credential
Professional Massage Therapy	600	24	Diploma

Please Note: ACCSC's records only reflect academic credits. Schools may be required to use a different calculation for Federal Financial Aid credit hours. Schools are reminded that they must maintain compliance with all applicable federal, state, and local government requirements (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*). Contact your Regional Case Manager at the United States Department of Education for guidance.

The Commission has updated the school's file to reflect the approved modifications. Additionally, the Commission acknowledges that the school may not immediately implement the modifications. Therefore, the school has 90 days from the date of this letter to implement the approved modifications. Cortiva Institute must update the Commission if the school has not implemented the program modifications within 90 days of the date of this letter.

As a result of the Commission's approval of the non-substantive modifications, please be aware that upon implementation of the modifications, the school may not continue to offer the previous curricula with the exception of teaching-out those students who enrolled in the program prior to the approval of the modification.

In addition, the Commission has included an ACCSC Program Implementation Enclosure with this letter, which lists suggestions deserving the school's immediate attention and action.

As you are aware, the Commission may adopt new standards or make revisions to current standards. While the modifications to its existing programs are approved, the school's programs are subject to review by an on-site evaluation team during its regular review process. Accordingly, the school is advised to review and comply with the most recent ACCSC standards. To review the most recent alerts and changes, please visit the ACCSC website at accsc.org.

Cortiva Institute – Arlington, Texas
SCHOOL #B072471
December 1, 2022
Page 2 of 3

The Commission will assess the school's ongoing compliance at the time of the school's renewal of accreditation process. Should you have any questions, please contact Sarah Havlicek at sarahhavlicek@accsc.org.

Sincerely,

A handwritten signature in cursive script that reads "Alanna Marx".

Alanna Marx M.A., M.B.A.
Director of Institutional Review and Development

c: Nicole Vitez
NVitez@hi.edu



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
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ACCREDITING COMMISSION OF CAREER SCHOOLS AND COLLEGES

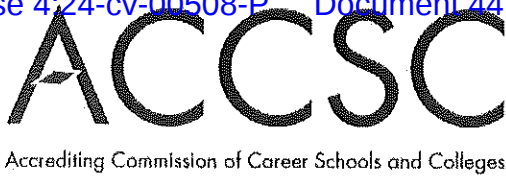
PROGRAM IMPLEMENTATION ENCLOSURE

CORTIVA INSTITUTE (SCHOOL #B072471)
ARLINGTON, TEXAS

December 1, 2022

The school is reminded that it is the Commission's expectation that when making non-substantive changes to a programs, the school must continue reporting student achievement rates on the prior versions of the programs until such versions of the programs have been completely taught-out (*Section VII (B) (1) (i), Substantive Standards, Standards of Accreditation*).

For example, when a modification results in reducing a program length from 18 months to 15 months, the school will continue to report on the 18-month version of the program in a continuous fashion. This means that the school will submit a Graduation and Employment ("G&E") Chart for the 18-month program as long as there are students in the reporting period. The school will also submit a G&E Chart for the 15-month version of the program beginning when the first students start in the revised version of the program.



2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
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December 1, 2022

ELECTRONIC DELIVERY

robert.slusher@cortiva.edu

Robert Slusher
Campus Director
Cortiva Institute
2370 34th Street North
St. Petersburg, Florida 33713

School #M001394

Dear Mr. Slusher:

The Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") received the Program Modification Report – Non-substantive Modifications submitted by Cortiva Institute located in St. Petersburg, Florida. Upon reviewing the information provided, the following modifications to the school's programs have been approved.

Program	Instructional Clock Hours	Semester Academic Credit Hours	Credential
Professional Massage Therapy	600	24	Diploma
Skin Care	300	11	Diploma

Please Note: ACCSC's records only reflect academic credits. Schools may be required to use a different calculation for Federal Financial Aid credit hours. Schools are reminded that they must maintain compliance with all applicable federal, state, and local government requirements (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*). Contact your Regional Case Manager at the United States Department of Education for guidance.

The Commission has updated the school's file to reflect the approved modifications. Additionally, the Commission acknowledges that the school may not immediately implement the modifications. Therefore, the school has 90 days from the date of this letter to implement the approved modifications. Cortiva Institute must update the Commission if the school has not implemented the program modifications within 90 days of the date of this letter.

As a result of the Commission's approval of the non-substantive modifications, please be aware that upon implementation of the modifications, the school may not continue to offer the previous curricula with the exception of teaching-out those students who enrolled in the program prior to the approval of the modification.

In addition, the Commission has included an ACCSC Program Implementation Enclosure with this letter, which lists suggestions deserving the school's immediate attention and action.

As you are aware, the Commission may adopt new standards or make revisions to current standards. While the modifications to its existing programs are approved, the school's programs are subject to review by an on-site evaluation team during its regular review process. Accordingly, the school is advised to review and comply with the most recent ACCSC standards. To review the most recent alerts and changes, please visit the ACCSC website at accsc.org.

Cortiva Institute – St. Petersburg, Florida
SCHOOL #M001394
December 1, 2022
Page 2 of 3

The Commission will assess the school's ongoing compliance at the time of the school's renewal of accreditation process. Should you have any questions, please contact Sarah Havlicek at sarahhavlicek@accsc.org.

Sincerely,

A handwritten signature in black ink that reads "Alanna Marx". The signature is fluid and cursive, with the first name "Alanna" and the last name "Marx" clearly distinguishable.

Alanna Marx M.A., M.B.A.
Director of Institutional Review and Development

c: Nicole Vitez
NVitez@hi.edu



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

ACCREDITING COMMISSION OF CAREER SCHOOLS AND COLLEGES

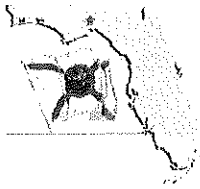
PROGRAM IMPLEMENTATION ENCLOSURE

CORTIVA INSTITUTE (SCHOOL #M001394)
ST. PETERSBURG, FLORIDA

December 1, 2022

The school is reminded that it is the Commission's expectation that when making non-substantive changes to a programs, the school must continue reporting student achievement rates on the prior versions of the programs until such versions of the programs have been completely taught-out (*Section VII (B) (1) (i), Substantive Standards, Standards of Accreditation*).

For example, when a modification results in reducing a program length from 18 months to 15 months, the school will continue to report on the 18-month version of the program in a continuous fashion. This means that the school will submit a Graduation and Employment ("G&E") Chart for the 18-month program as long as there are students in the reporting period. The school will also submit a G&E Chart for the 15-month version of the program beginning when the first students start in the revised version of the program.



Commission for Independent Education

Approved Data

Cortiva Institute (ID# 2215)

Corporation Data

Name: Full Circle Education LLC

Foreign or Domestic: Domestic

Profit or Non Profit: Profit

Address Data

2600 Lake Lucien Dr., Suite 140

Maitland, FL 32751

Orange County

Contact Data

Contact: Ms. Nicole Vitez

Phone: (407) 261-0319 **Phone Ext:**

Fax: (407) 261-0342

E-Mail: nvitez@cortiva.edu

Web Site: www.cortiva.edu

License Data

Lic #: 2215 **Campus Type:** Branch

Lic Status: License By Means of Accreditation

Program Specialist: Ashley Schenck

Annual Review Date: 1/31/2020

Accredited by:	Level of Accreditation:	Last Granted:	Renewal Date:	Next visit Scheduled:
ACCSC	Institutional	08/01/2011	08/01/2020	08/01/2006

Program Title as Licensed:	Hours:		Degree Type:	Credential:
	Clock	Credit		
Advanced Paramedical Skin Care	976	29.5		Diploma
Makeup Artistry and Skin Care Training	600	17.5		Diploma
Professional Massage Therapy	600	24		Diploma
Skin Care Training	300	11		Diploma

Ashley Schenck
Program Specialist
Commission for Independent Education

Page 1 of 1
3/23/2023 3:25:41 PM



Commission for Independent Education

Approved Data

Cortiva Institute (ID# 2217)

Corporation Data

Name: Full Circle Education LLC

Foreign or Domestic: Domestic

Profit or Non Profit: Profit

Address Data

2001 West Sample Road Suite #100

Pompano Beach, FL 33064

Broward County

Contact Data

Contact: Ms. Nicole Vitez

Phone: (954) 975-6400 **Phone Ext:**

Fax: (954) 975-9633

E-Mail: nvitez@cortiva.edu

Web Site: www.cortiva.edu

License Data

Lic #: 2217 **Campus Type:** Main

Lic Status: License By Means of Accreditation

Program Specialist: Ashley Schenck

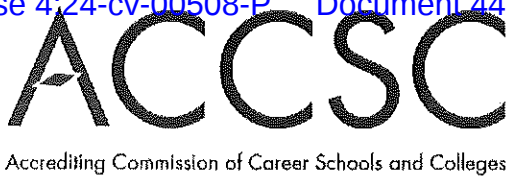
Annual Review Date: 1/31/2020

Accredited by:	Level of Accreditation:	Last Granted:	Renewal Date:	Next visit Scheduled:
ACCSC	Institutional	08/01/2010	08/01/2020	08/01/2006

Program Title as Licensed:	Hours:		Degree Type:	Credential:
	Clock	Credit		
Advanced Paramedical Skin Care	976	29.5		Diploma
Makeup Artistry and Skin Care Training	600	17.5		Diploma
Professional Massage Therapy	600	24		Diploma
Skin Care Training	300	11		Diploma

Ashley Schenck
Program Specialist
Commission for Independent Education

Page 1 of 1
3/23/2023 3:28:33 PM



2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

December 1, 2022

ELECTRONIC DELIVERY

reneL@cortiva.edu

Rene Lezcano
Campus Director
Cortiva Institute
2001 West Sample Road
Pompano Beach, Florida 33064

School #M058368

Dear Mr. Lezcano:

The Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") received the Program Modification Report – Non-substantive Modifications submitted by Cortiva Institute located in Pompano Beach, Florida. Upon reviewing the information provided, the following modifications to the school's programs have been approved.

Program	Instructional Clock Hours	Semester Academic Credit Hours	Credential
From: Professional Massage Training	600	20	Diploma
To: Professional Massage Therapy	600	24	Diploma
From: Skin Care Training	300	9	Diploma
To: Skin Care Training	300	11	Diploma

Please Note: ACCSC's records only reflect academic credits. Schools may be required to use a different calculation for Federal Financial Aid credit hours. Schools are reminded that they must maintain compliance with all applicable federal, state, and local government requirements (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*). Contact your Regional Case Manager at the United States Department of Education for guidance.

The Commission has updated the school's file to reflect the approved modifications. Additionally, the Commission acknowledges that the school may not immediately implement the modifications. Therefore, the school has 90 days from the date of this letter to implement the approved modifications. Cortiva Institute must update the Commission if the school has not implemented the program modifications within 90 days of the date of this letter.

As a result of the Commission's approval of the non-substantive modifications, please be aware that upon implementation of the modifications, the school may not continue to offer the previous curricula with the exception of teaching-out those students who enrolled in the program prior to the approval of the modification.

In addition, the Commission has included an ACCSC Program Implementation Enclosure with this letter, which lists suggestions deserving the school's immediate attention and action.

As you are aware, the Commission may adopt new standards or make revisions to current standards. While the modifications to its existing programs are approved, the school's programs are subject to review by an

Cortiva Institute – Pompano Beach, Florida
SCHOOL #M058368
December 1, 2022
Page 2 of 3

on-site evaluation team during its regular review process. Accordingly, the school is advised to review and comply with the most recent ACCSC standards. To review the most recent alerts and changes, please visit the ACCSC website at accsc.org.

The Commission will assess the school's ongoing compliance at the time of the school's renewal of accreditation process. Should you have any questions, please contact Sarah Havlicek at sarahhavlicek@accsc.org.

Sincerely,

A handwritten signature in black ink that reads "Alanna Marx". The signature is fluid and cursive, with the first name "Alanna" and the last name "Marx" clearly distinguishable.

Alanna Marx M.A., M.B.A.
Director of Institutional Review and Development

c: Nicole Vitez
NVitez@hi.edu



Accrediting Commission of Career Schools and Colleges

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ACCREDITING COMMISSION OF CAREER SCHOOLS AND COLLEGES

PROGRAM IMPLEMENTATION ENCLOSURE

CORTIVA INSTITUTE (SCHOOL #M058368)
POMPAÑO BEACH, FLORIDA

DECEMBER 1, 2022

The school is reminded that it is the Commission's expectation that when making non-substantive changes to a programs, the school must continue reporting student achievement rates on the prior versions of the programs until such versions of the programs have been completely taught-out (*Section VII (B) (1) (i), Substantive Standards , Standards of Accreditation*).

For example, when a modification results in reducing a program length from 18 months to 15 months, the school will continue to report on the 18-month version of the program in a continuous fashion. This means that the school will submit a Graduation and Employment ("G&E") Chart for the 18-month program as long as there are students in the reporting period. The school will also submit a G&E Chart for the 15-month version of the program beginning when the first students start in the revised version of the program.



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
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www.accsc.org

December 1, 2022

ELECTRONIC DELIVERY

James.Black@cortiva.edu

Rob Black
Campus Director
Cortiva Institute
2600 Lake Lucien Drive Suite 140
Maitland, Florida 32751

School #M070142

Dear Mr. Black:

The Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") received the Program Modification Report – Non-substantive Modifications submitted by Cortiva Institute located in Maitland, Florida. Upon reviewing the information provided, the following modifications to the school's programs have been approved.

Program	Instructional Clock Hours	Semester Academic Credit Hours	Credential
Professional Massage Therapy	600	24	Diploma
Skin Care Training	300	11	Diploma

Please Note: ACCSC's records only reflect academic credits. Schools may be required to use a different calculation for Federal Financial Aid credit hours. Schools are reminded that they must maintain compliance with all applicable federal, state, and local government requirements (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*). Contact your Regional Case Manager at the United States Department of Education for guidance.

The Commission has updated the school's file to reflect the approved modifications. Additionally, the Commission acknowledges that the school may not immediately implement the modifications. Therefore, the school has 90 days from the date of this letter to implement the approved modifications. Cortiva Institute must update the Commission if the school has not implemented the program modifications within 90 days of the date of this letter.

As a result of the Commission's approval of the non-substantive modifications, please be aware that upon implementation of the modifications, the school may not continue to offer the previous curricula with the exception of teaching-out those students who enrolled in the program prior to the approval of the modification.

In addition, the Commission has included an ACCSC Program Implementation Enclosure with this letter, which lists suggestions deserving the school's immediate attention and action.

As you are aware, the Commission may adopt new standards or make revisions to current standards. While the modifications to its existing programs are approved, the school's programs are subject to review by an on-site evaluation team during its regular review process. Accordingly, the school is advised to review and comply with the most recent ACCSC standards. To review the most recent alerts and changes, please visit the ACCSC website at accsc.org.

Cortiva Institute -- Maitland, Florida
SCHOOL #M070142
December 1, 2022
Page 2 of 3

The Commission will assess the school's ongoing compliance at the time of the school's renewal of accreditation process. Should you have any questions, please contact Sarah Havlicek at sarahhavlicek@accsc.org.

Sincerely,

A handwritten signature in cursive script that reads "Alanna Marx".

Alanna Marx M.A., M.B.A.
Director of Institutional Review and Development

c: Nicole Vitez
NVitez@hi.edu



Accrediting Commission of Career Schools and Colleges

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ACCREDITING COMMISSION OF CAREER SCHOOLS AND COLLEGES

PROGRAM IMPLEMENTATION ENCLOSURE

CORTIVA INSTITUTE (SCHOOL #M070142)
MAITLAND, FLORIDA

December 1, 2022

The school is reminded that it is the Commission's expectation that when making non-substantive changes to a programs, the school must continue reporting student achievement rates on the prior versions of the programs until such versions of the programs have been completely taught-out (*Section VII (B) (1) (i), Substantive Standards, Standards of Accreditation*).

For example, when a modification results in reducing a program length from 18 months to 15 months, the school will continue to report on the 18-month version of the program in a continuous fashion. This means that the school will submit a Graduation and Employment ("G&E") Chart for the 18-month program as long as there are students in the reporting period. The school will also submit a G&E Chart for the 15-month version of the program beginning when the first students start in the revised version of the program.

EXHIBIT B

Mecca, Shari

From: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Sent: Tuesday, June 11, 2024 1:55 PM
To: Mecca, Shari
Subject: RE: [External Email] Message therapy question

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Shari,

The information can be found on our website, and I have provided the links below:

Chapter 455 [OCCUPATIONS CODE CHAPTER 455. MESSAGE THERAPY \(texas.gov\)](#)

Chapter 117 [Texas Administrative Code \(state.tx.us\)](#)

[Massage Therapy Homepage \(texas.gov\)](#)

Thank you,

Lorraine Sroufe
Education & School Services Manager
Education & Examination Division



TEXAS DEPARTMENT OF
LICENSING & REGULATION [Texas Department of Licensing and Regulation - Forms - TDLR – Education Form](#)

"If we teach today's students as we taught yesterday's, we rob them of tomorrow". John Dewey

From: Mecca, Shari <Shari.Mecca@ed.gov>
Sent: Tuesday, June 11, 2024 12:38 PM
To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Subject: RE: [External Email] Message therapy question

Hi Lorraine,

Would you be able to send me a link to the statute you reference below. Thank you.

Shari

From: Lorraine Sroufe <[Lorraine.Sroufe@tdlr.texas.gov](#)>
Sent: Thursday, June 6, 2024 1:09 PM
To: Mecca, Shari <[Shari.Mecca@ed.gov](#)>
Subject: RE: [External Email] Message therapy question

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Shari,

TDLR took over for the regulation for massage therapy from DSHS in 2017. DSHS did allow massage therapy school to offer curriculum courses in excess of the required 500-hour course. However, upon evaluation of the statute, it was clearly determined that the agency did not have the authority to do so. We were finally able to get the rules approved and updated on February 1, 2020, to remove the approval of any excess hours over the required 500-hour course. All schools were notified, and we started issuing the certificate of approvals on 9/1/2020 which was when the student permit requirements went into effect.

Thank you,

Lorraine

From: Mecca, Shari <Shari.Mecca@ed.gov>
Sent: Thursday, June 6, 2024 11:28 AM
To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Subject: RE: [External Email] Massage therapy question

I did notice that the other state licenses that we have only list the program and not the hours. So, thank you. Can you please confirm again, that this is the only massage therapy the school is licensed to offer.

Also, can you confirm if Texas was always 500 hours, and if not, what was it prior and when was the prior hours in effect.

Thank you.

Shari

From: Mecca, Shari
Sent: Thursday, June 6, 2024 12:00 PM
To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Subject: RE: [External Email] Massage therapy question

Thank you. I really appreciate you getting back to me so quickly.

Shari

From: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Sent: Thursday, June 6, 2024 11:53 AM
To: Mecca, Shari <Shari.Mecca@ed.gov>
Subject: RE: [External Email] Massage therapy question

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Shari,

Please find attached the course approval for Cortiva Institute in Arlington, license MS1072. Licensed massage therapy schools are only approved to offer the 500-hour massage therapy course. The attached certificate of approval is issued for incidents such as this where verification of the course approval is needed for other agencies. The school is not approved to offer under or over the required 500-hour course.

Please let me know if you have any questions.

Thank you,

*Lorraine Sroufe
Education & School Services Manager
Education & Examination Division*



TEXAS DEPARTMENT OF
LICENSING & REGULATION

[Texas Department of Licensing and Regulation - Forms -TDLR – Education Form](#)

"If we teach today's students as we taught yesterday's, we rob them of tomorrow". John Dewey

From: Mecca, Shari <Shari.Mecca@ed.gov>
Sent: Thursday, June 6, 2024 8:16 AM
To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Subject: [External Email] Massage therapy question

CAUTION: This email originated from outside of the organization! Do not click links, open attachments or reply, unless you recognize the sender's email address and know the content is safe!

Hi Lorraine,

Your name was given to me by my colleague Kim Peeler with the Dallas School Participation Division. I have a question and could not find a telephone number to call you. I am wondering if Cortiva Institute in Arlington Texas has submitted a request to reduce its number of clock hours for its massage therapy program.

Thank you.

Shari Mecca
Case Manager
Multi-Regional and Foreign Schools Participation Division
School Eligibility and Oversight Group
347.346.1320
shari.mecca@ed.gov

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

TEXAS DEPARTMENT OF LICENSING AND REGULATION

MASSAGE THERAPY COURSE CERTIFICATE OF APPROVAL

CORTIVA INSTITUTE

SCHOOL LICENSE: MS1072

ISSUE DATE: 09/01/2020

The school is authorized to offer the course noted below in accordance with the Massage Therapy Law §455.156 for License Requirements for Massage Therapist.

Massage Therapy 500 Hour Course

CORTIVA INSTITUTE, SCHOOL LICENSE MS1072 currently holds an active school license with the department originally issued 07/26/2019. If the approved course is no longer being offered, the school must contact the Texas Department of Licensing and Regulation, Education and Examination Division within 30 days so that the school's record is updated. This certificate certifies that CORTIVA INSTITUTE has met the applicable provisions of the Massage Therapy Texas Occupations Code §455; and Massage Therapy Program Administrative Rules, 16 Texas Administrative Code, Chapter 117.

Ray Pizarro

DIRECTOR, EDUCATION & EXAMINATION DIVISION

EXHIBIT C

Mecca, Shari

From: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Sent: Thursday, July 11, 2024 9:02 AM
To: Mecca, Shari
Subject: RE: [External Email] RE: TEAMS Meeting Request for 7.21.24 Regulation

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Shari,

Thank you for your response and the information!

Have a wonderful day,

Lorraine

From: Mecca, Shari <Shari.Mecca@ed.gov>
Sent: Wednesday, July 10, 2024 12:19 PM
To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Subject: RE: [External Email] RE: TEAMS Meeting Request for 7.21.24 Regulation

Hi Lorraine,

Sorry for the delay in response. An electronic announcement was release last week about the program length regulations. Please see [Temporary Injunction on Program Length Regulations | Knowledge Center](#).

Sincerely,

Shari Mecca
Case Manager
Multi-Regional and Foreign Schools Participation Division
School Eligibility and Oversight Group
347.346.1320
shari.mecca@ed.gov

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION

From: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>
Sent: Monday, June 24, 2024 3:19 PM
To: Mecca, Shari <Shari.Mecca@ed.gov>
Subject: RE: [External Email] RE: TEAMS Meeting Request for 7.21.24 Regulation

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Shari,

Here are a few questions that we would appreciate your assistance in answering:

How many Texas schools do you anticipate will **not** continue to function on their own within the next year?

Do you anticipate a growth or decline in student population for Massage, Barber, and Cosmetology industries after July 1?

Because of the new requirements effective 7/1/24, will schools have to return any Title IV funds?

TDLR will not and cannot approve any massage, barber, or cosmetology course for more than the required hours of education for licensure. What impact do you think that will have on TDLR as the state regulatory agency for these industries?

Are you making any changes to your customer service procedures to prepare for the effective date of 7/1/24 for this new requirement?

Have you seen a growth in contacts or inquiries as a result of the new requirements?

Any suggestions or information that you can provide that will be helpful to the inquiries we receive from schools based on these new requirements would be greatly appreciated.

Thank you,

Lorraine Sroufe

Education & School Services Manager

Education & Examination Division



**TEXAS DEPARTMENT OF
LICENSING & REGULATION**

[Texas Department of Licensing and Regulation - Forms - TDLR – Education Form](#)

"If we teach today's students as we taught yesterday's, we rob them of tomorrow". John Dewey

From: Mecca, Shari <Shari.Mecca@ed.gov>

Sent: Friday, June 21, 2024 2:58 PM

To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>

Subject: [External Email] RE: TEAMS Meeting Request for 7.21.24 Regulation

CAUTION: This email originated from outside of the organization! Do not click links, open attachments or reply, unless you recognize the sender's email address and know the content is safe!

Good afternoon, Lorraine,

I wanted to acknowledge receipt of your email and will get back to you next week. It will be helpful if you can send me your questions in advance of any call, so I can ensure that I have the appropriate staff available.

Thank you.

Shari

From: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>

Sent: Friday, June 21, 2024 1:05 PM

To: Mecca, Shari <Shari.Mecca@ed.gov>

Subject: TEAMS Meeting Request for 7.21.24 Regulation

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Shari,

Our director has requested that we schedule a TEAMS meeting to discuss the new regulation that will be implemented on July 1, 2024. We would like the opportunity to discuss some of these new regulations and the impact that will have on our licensed schools so that we can be prepared to answer any questions.

Please let me know when your team would be available, or if I need to send this request to someone else.

Thank you,

*Lorraine Sroufe
Education & School Services Manager
Education & Examination Division*



TEXAS DEPARTMENT OF
LICENSING & REGULATION

[Texas Department of Licensing and Regulation - Forms - TDLR – Education Form](#)

"If we teach today's students as we taught yesterday's, we rob them of tomorrow". John Dewey

From: Mecca, Shari <Shari.Mecca@ed.gov>

Sent: Monday, June 10, 2024 11:49 AM

To: Lorraine Sroufe <Lorraine.Sroufe@tdlr.texas.gov>

Subject: RE: [External Email] Massage therapy question

Good afternoon, Lorraine,

I am including two links to the new regulations that come into play on July 1, 2024. A school would need to submit an application through our Partner Connect System to report the changes to the program length. Once we receive the application, we would verify their state and accreditor licenses are also approved for the same hours.

Please let me know if you have any further questions.

Shari

[Updates on New Regulatory Provisions Related to Certification Procedures and Ability-to-Benefit | Knowledge Center](#)
[Implementation of Regulations Related to Financial Responsibility, Administrative Capability, Certification Procedures, and Ability to Benefit \(ATB\) \(Updated May 23, 2024\) | Knowledge Center](#)

Thank you.

Shari Mecca
Case Manager
Multi-Regional and Foreign Schools Participation Division
School Eligibility and Oversight Group
347.346.1320
shari.mecca@ed.gov



EXHIBIT D

From: Fernandez-Rosario, Martina

Sent: Friday, July 19, 2024 12:01 PM

To: 'Lorraine.Sroufe@tdlr.texas.gov' <Lorraine.Sroufe@tdlr.texas.gov>

Subject: Texas Department of Licensing and Regulation - Massage Therapy Programs

Greetings Ms. Sroufe,

I am writing to you to follow up on information you provided to Shari Mecca of my staff. Based on your communications with Ms. Mecca, I understand that the Texas Department of Licensing and Regulation (TDLR) has determined that, under state law, it does not have the authority to approve a massage program for more than 500 hours, the hours required for massage therapy licensing in Texas. Ms. Mecca was also provided with the TDLR Certificate of Approval for one such program, which states that the school “is authorized to offer the course noted below in accordance with the Massage Therapy Law § 455.156 for License Requirements for Massage Therapist,” and identifies the authorized course as a “Massage Therapy 500 Hour Course.” My staff has also become aware that some schools continue to offer massage therapy programs that exceed the 500-hour approval that TDLR provides, and that TDLR does not take any action to prohibit such programs, provided that their students sign a “massage student acknowledgement” (TDLR form # MAS123N), but also does not grant those programs approval due to state law requirements.

In light of this information, the Department will be reviewing the Title IV eligibility of all massage programs provided at institutions in Texas participating in the Title IV programs to determine if the institutions have been improperly disbursing Title IV funds to students in massage programs with hours in excess of the 500 clock hours approved by TDLR. Title IV regulations require that institutions be legally authorized to provide postsecondary programs in order to be eligible to participate in the Title IV programs. 34 C.F.R. § 600.9. For purposes of the Title IV programs, educational programs are those legally authorized by the state. See 34 C.F.R. § 600.2 (definition of educational program). Where states approve programs of a specific length, the Department considers the state’s authorization to cover programs of that length but not programs that exceed that length. Because TDLR limits its approval for massage therapy programs to programs that do not exceed 500 clock hours, massage therapy programs in Texas that exceed 500-clock hours are not Title IV eligible, and students enrolled in those programs are not eligible for Title IV aid. Although the Department will be contacting the institutions individually about this issue, we wanted to inform your office of the Department’s position on the issue. Institutions that modify the length of their massage therapy programs in response to the Department’s notification will be able to submit the state approved 500-clock hour program to the Department for approval once it is approved by the institutions’ accreditor.

Once the Department begins its review, we may need to reach out to your office to ensure that our list of institutions offering massage therapy programs in Texas is complete. Thank you in advance for any assistance you might be able to provide.

Please feel free to contact me if you have any questions about this issue.

Martina Fernandez-Rosario

Director
School Eligibility and Oversight Service Group
U.S. Department of Education | Federal Student Aid
50 United Nations Plaza, Mailbox 1200
Suite 1273 | San Francisco, CA 94102
(202) 453-6744 Office | (650) 676-7369 Mobile

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